

Bayway Refinery P.O. Box 222 1400 Park Avenue Linden, New Jersey 07036

Certified Mail - RRR 7005 1140 0003 9477 5800

February 9, 2011

US Environmental Protection Agency
Ariel Rios Building
Mail Code 2254A
1200 Pennsylvania Avenue, NW,
Washington, DC 20460
Attn: Robert G. Heiss, Director
International Compliance Assurance Division

2010 Annual Export Report NJD 986 645 984

Dear Mr. Heiss:

As required by Section 3017 of the Resource Conservation and Recovery Act and under Federal regulations 40 CFR Sections 262.56 and 262.87(a), I submit the "Annual Report of Hazardous Waste Exports for 2010" and waste minimization statements for the ConocoPhillips owned and operated Bayway Refinery. The refinery is located at 1400 Park Avenue, Linden, New Jersey 07036.

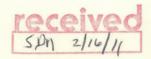
Contact me at (908) 523-5732 if you need additional information.

Sincerely,

Hans Sidler

Waste Compliance Engineer

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SEPA

Robert G. Heiss, Director USEPA Int'l Compli. Assur. Div. Mail Code 2254A 1200 Pennsylvania Avenue, NW Washington DC 20460

First Class Mail

First Class Mail

Bayway Refinery P.O. Box 222 1400 Park Avenue Linden, NJ 07036

CERTIFIED MAIL

To: Heiss,Robert

Mailstop: 2254A Department: OFA

PKG Condition Mailcode:

US POSTAL

70081140000394775800



























1.	PRIMARY EXPORTER	(Cons	ignor)							
	Name:		Conoc	oPhilli	ps Company / Bayway Refinery					
	EPA ID No.		NJD 9	8664598	4					
	Mailing Address:		P.O.	Box 222						
	City:		Linde	n	State: New Jersey Zip: 07036					
2.	CONSIGNEE									
	Name:									
	Address	-								
					Canada J7C3V4					
	EPA ID No.:	NYD	980/564	15						
3.	TRANSPORTER No. 1		Name:		Freehold Cartage Inc					
٥.	IMMOPONIEM NO. I	•		No ·						
			DIA ID	110						
	TRANSPORTER No. 2	:	Name:							
			EPA ID	No.:	NYF 006000053					
	TRANSPORTER No. 3	:	Name:							
				No.:						
4.	WASTE INFORMATION			OnocoPhillips Company / Bayway Refinery JD 986645984 O. Box 222 inden State: New Jersey Zip: 07036 Canada, Inc. ustrial Blvd. lle, Quebec Canada J7C3V4 756415 De: Freehold Cartage Inc. A ID No.: NJD 054126164 De: Transport Rollex Limitee A ID No.: NYF 006000053 De: A ID No.: Spent Sandblast Abrasives D008 D008 D008 D008 D008 D009 D008 D009 D009						
	Description of Wa	Description of Waste: Spent Sandblast Abrasives								
	EPA Waste Numbe	200			D008					
	EFA Waste Numbe	ILS.			0000					
	DOT Proper Ship	pina	Name:	RO Wast	e Environmentally Hazardous Substance.					
		F3		The state of the s						
	DOT Hazard Clas	s:		9	DOT ID Code (UN/NA): UN 3077					
5.	SHIPPING INFORMAT	TON								
٥.	Dilli ing in oldin	1011								
	Number of Shipm	ents	during	the Cal	endar Year: 3					
	Total Volume of									
				11						
					= 67500 P					
6.	WASTE MINIMIZATIO	N STA	TEMENT							
	Not Book	ired	/Sec Tr	at mat i	onal					
	Submitted with EPA Biennial Report									
	x Attached									
7.	CERTIFICATION									
I cer	tify under penalty	of 1	aw that	I have	personally examined and am familiar					
with	the information su	bmitt	ed in t	his and	all attached documents, and that					
based	on my inquiry of	those	e indivi	duals i	mmediately responsible for obtaining					
the i	nformation, I beli	eve t	hat the	submit	ted information is true, accurate, and					
				7.						
infor	mation including t	he po	ssibili	ty of f	ine and imprisonment.					
Name	of Responsible Off	icial	: Hans	Sidler	Title: Waste Compliance Engineer					
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1.	PRIMARY EXPORTER	(Consignor)			
	Name:		hillips Comp	any / Bayway Refinery	
	EPA ID No.	NJD 986	645984		
	Mailing Address:				
	City:	Linden	S	tate: New Jersey Zip:	07036
2.	CONSIGNEE				
	Name:	STABLEX Canad	a, Inc.		
	Address	760 Industria	l Blvd.		
		Blainville, Q		J7C3V4	
	EPA ID No.:	NYD 980756415			
3.	TRANSPORTER No. 1			ransport Rollex Limite	ee
		EPA ID No	N .:	YF 006000053	
	TRANSPORTER No. 2	P: Name: EPA ID No			
4.	WASTE INFORMATION Description of Wa		Lead Acid Ba	tteries	
	EPA Waste Number	ers:	D002,	D008	
	DOT Proper Ship		Waste Batte	eries, Wet, Filled with	h Acid,
	DOT Hazard Clas	ss: 8	D	OT ID Code (UN/NA):	UN 2794
5.	SHIPPING INFORMAT	NOI			
	Number of Shipm Total Volume of			Year: 3 2.02 tons	
6.	WASTE MINIMIZATIO	N STATEMENT		= 4040 p	
	Not Requ	uired (See Inst	ructions)		
	Submitte	ed with EPA Bie	ennial Report		
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				Waste Compliance Engi	neer
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Signe	ed: Me a -	_	D	ate: 2/4/20//	

1.	PRIMARY EXPORTER (C				
	Name:			Company /	Bayway Refinery
	EPA ID No.		986645984		
	Mailing Address:		Box 222		N
	City:	Linde	en	State:	New Jersey Zip: 07036
2.	CONSIGNEE Name:	STABLEX Car	nada, Inc.		
	V-1	760 Industr			
		Blainville,		inada J7C3	V4
	EPA ID No.:	NYD 9807564	115		
3.	TRANSPORTER No. 1:	Name:		Transp	ort Rollex Limitee
		EPA ID	No.:	NYF 00	
	TRANSPORTER No. 2:	Name: EPA ID	No.:		
4.	WASTE INFORMATION				
4.	Description of Wast	ie:	Mixed Ba	tteries	
	EPA Waste Number:	s:	I	0003, D006	, D011, D008
	DOT Proper Shipp:	ing Name:			Dry, Containing Potassium
			Hydroxide	Solia, PG	
	DOT Hazard Class	:	8	DOT ID	Code (UN/NA): UN3028
5.	SHIPPING INFORMATION	M			
	Number of Shipmer Total Volume of	The state of the s		dar Year:	3 0.45 tons
					= 700 B
6.	WASTE MINIMIZATION	STATEMENT			- 700 P
	Not Requir	red (See In	nstructions	3)	
	Submitted	with EPA H	Biennial Re	eport	
	xAttached				
7.	CERTIFICATION	f lan that	T have no		avaniand and an familian
with based the i	the information subm d on my inquiry of th information, I believ	nitted in to nose indiving to that the at there ar	this and alleduals immedes submitted to the submitted to the signification of the submitted to the submitted	l attached diately re l informati ant penalt	examined and am familiar d documents, and that esponsible for obtaining ion is true, accurate, and ties for submitting false isonment.
Name	of Responsible Offic	ial: Hans	Sidler Tit	:le: Waste	e Compliance Engineer
	Δ	1	2 - May	***************************************	
Signe	ad: A	/_		Date	2/9/2011

1.	PRIMARY EXPORTER (Co					
				Company /	Bayway Refiner	У
			986645984			
		P.O.				
	City:	Linde	en	State:	New Jersey Zip	: 07036
2.	CONSIGNEE					
	Name: ST	ABLEX Car	nada, Inc.			
			rial Blvd.			
	B]	ainville	, Quebec C	anada J7C3	3V4	
	EPA ID No.: NY	ZD 980756	415			
3.	TRANSPORTER No. 1:	Name:			ort Rollex Limit	tee
		EPA ID	No.:	NYF 00	06000053	
	TRANSPORTER No. 2:	Name:				
		EPA ID	No.:			
4.	WASTE INFORMATION					
	Description of Waste	a :	Catalys	t (Zinc Ox	ide)	
	EPA Waste Numbers	:		K171		
	ACCOUNT OF MARKET AND ACCOUNT OF THE					
	DOT Proper Shippin	ng Name:				bstance,
			n.o.s., (K	171), III,	RQ-1 (K171)	
	DOM H 1 G1		0	DOF TE	C 1 (7777 (7777)	*****
	DOT Hazard Class:	-	9	DOT IL	Code (UN/NA):	<u>UN3077</u>
5.	SHIPPING INFORMATION	1				
	Number of Shipment			dar Year:		
	Total Volume of th	nis Waste	Shipped:		3.90 tons	
					78004	
-	THE COMP. LATITUTE DISTRICT.			=	19001	
6.	WASTE MINIMIZATION S	TATEMENT				
	Not Require	ed (See I	nstruction	s)		
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7.	CERTIFICATION		- 1	7.7		
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	Ave up a	- T	7.			
Name	of Responsible Offici	al: Hans	Sidler Ti	tle: Wast	e Compliance Eng	gineer
	4	0			1 /	
0	ed: ME	1		Date:	2/9/20	UI.
Sign	ea: /// E	~		Date:	-1.1-	• •

	Name:	A 100 (101)	o Philli	ne Compa	nu / I	Rauman Pof	inory	
	EPA ID No.		nocoPhillips Company / Bayway Refinery 0 986645984					
	Mailing Address:	The second secon	Box 222					
	City:	Linde			ato. I	New Jersey	7in.	07036
	City.		311	. 31	ate: I	new Jersey	ZID:	07036
2.	CONSIGNEE							
	Name:	STABLEX Can						
	Address	760 Industr				H H H		
		Blainville,	Quebec	Canada	J7C3V	1		
	EPA ID No.:	NYD 9807564	15					
3.	TRANSPORTER No. 1:	: Name:		Transp	ort Ro	ollex Limi	tee	
		EPA ID	No.:		F 0060			_
	MDANGDODMED N							T
	TRANSPORTER No. 2:	35 2730/73/33/33/33						
		EPA ID	No.:					
4.	WASTE INFORMATION			7.1	,	D 1 1 61 1		
	Description of Was	ste:	-	Abrasive	s and	Paint Chi	ps	_
	EPA Waste Number	re•		D008, D	0007			
	BITI Wabte Wambe.	20.		Dodd, D	3007			
	DOT Proper Ship	ping Name:	RQ Wast	e Enviro	nment	ally Hazar	dous	Substance,
						D007), II		
	DOT Hazard Class	s:	9	DO	T ID C	Code (UN/N	A):	UN 3077
5.	SHIPPING INFORMAT	ION						
	V		6.1	1				
	Number of Shipme				ear: _		· consequence	
	Total Volume of	this Waste	Shipped	1:	-	2.45	tons	_
						= 4900 P	j	
6.	WASTE MINIMIZATION	STATEMENT				5 71001		
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Waste Minimization Statement for Hazardous Characteristic Contaminated Spent Sandblast Abrasives

The ConocoPhillips Company owned and operated Bayway Refinery is committed to operating the refinery in an environmentally responsible manner. A source reduction program has been implemented and is continuously being improved.

The Bayway Refinery utilizes crude petroleum as feed stock to produce a complete line of fuel products as well as petrochemical feed stocks and specialty products. The facility does not purchase or produce lead or other hazardous characteristic containing products. The Bayway Refinery uses only environmentally friendly, non-lead based coatings on new and repaired equipment.

As part of the operations of the refinery, rust, scale and paint are removed from transfer lines, storage tanks and process equipment by sand blasting with abrasives in order to prepare surfaces for metal inspection, welding or repainting. Employees have been informed of the potential for lead based coatings at the refinery. They are trained to test dry paints and primers prior to removal and to segregate contaminated media from each job site regardless of generated volume.

Old protective coatings slated for removal are tested by analysis and/or lead stick for lead content. Rather than using a dry sandblast technique, lead based paint from transfer lines, storage tanks and process equipment in difficult to access areas is removed by scraping or by high pressure water and wet garnet blasting, whenever feasible.

Paint removal from tanks is accomplished by either pressure washing, or by utilizing the "Versa Blast" vertical blast cleaning system. The system cleans vertical surfaces by using steel split shot and a very small amount of grit as the blast cleaning media. A hoist system, which is mounted on a fixture at the top of the tank being cleaned, raises and lowers the blast module as the module moves along the surface horizontally. The system is capable of providing white metal finishes.

The horizontal speed, vertical speed, shot flow rate, and fixture movement are adjusted by remote control. The abrasive media are contained, circulated, and cleaned within the blast module. A cyclone separator on the ground separates the steel split shot from the media for re-use and deposits the paint and dust into plastic lined 55-gallon drums. The process reduces the volume of generated lead contaminated hazardous abrasives by up to 95%.

The Bayway Refinery has considered several waste management method alternatives. On-site remediation or fixation of the lead constituent contained in the waste is not feasible because of cost and the lack of treatment permits. Treatment of the low BTU waste by incineration does not reduce the lead hazard and would result in impermissible dilution of the lead component in the incinerator ash.

This minimization statement pertains to shipments of Hazardous Characteristic Contaminated Spent Sandblast Abrasives on pages 1 and 5 of the annual report.

Waste Minimization Statement for Spent Lead Acid Batteries

The ConocoPhillips Company owned and operated Bayway Refinery is committed to operating the refinery in an environmentally responsible manner. A source reduction program has been implemented and is continuously being improved.

The Bayway Refinery has approximately 100 substations which distribute electric power to the various process units. Energy for the substation switchgear and control panels is provided by twelve to sixty lead acid batteries per station. These batteries are periodically replaced to ensure a reliable and uninterrupted electric power supply to the refinery.

The Bayway Refinery is taking source reduction action to reduce the volume of generated used lead acid batteries from substations by choosing high-grade replacement batteries that have an estimated useful service life of more than twenty years. When the refinery purchases automotive lead acid batteries for its fleet of cars, trucks and heavy equipment, an equivalent number of spent automotive batteries is returned to the supplier for recycling.

The Bayway Refinery has considered several waste management method alternatives for lead acid batteries from substations. Shipping these batteries for metal reclamation to a lead smelter in Missouri is deemed unacceptable because of potential future environmental liability concerns. State and Federal agencies have determined that many residential properties in the vicinity of the Missouri plant have been contaminated by lead emissions from the smelting operation. The facility has also received many citations and fines.

In the absence of an alternate and readily available lead smelting facility which is protective to human health and the environment, the Bayway Refinery believes that the present method of shipping the batteries to a competent and experienced waste management service provider for treatment and disposal to be an environmentally sound option.

This minimization statement pertains to shipments of Spent Lead Acid Batteries on page 2 of the annual report.

Waste Minimization Statement for Mixed Batteries

The ConocoPhillips Company owned and operated Bayway Refinery is committed to operating the refinery in an environmentally responsible manner. A source reduction program has been implemented and is continuously being improved.

Bayway Refinery employees and contractors use a variety of equipment and tools that are powered by batteries, including alkaline, silver oxide, lithium, nickel/metal hydride and various other types. Spent batteries are collected and placed into satellite accumulation containers.

The Bayway Refinery has considered sorting the batteries by type in order to make them amenable to metal reclamation. Spent batteries come in all shapes and sizes and vary in length from a fraction of an inch to several inches each. Experience has shown that sorting of those batteries by type to render them acceptable for metal reclamation is tedious, time consuming and subject to human error. Sorting and subsequent transportation of the small volume of generated batteries to various facilities is not cost-effective.

The Bayway Refinery believes that the proper treatment and disposal of a limited volume mixed batteries by a competent and experienced waste management service provider is protective to human health and the environment and constitutes currently the most economically practicable waste management option available to us.

This minimization statement pertains to shipments of Mixed Batteries on pages 3 of the annual report.

Waste Minimization Statement for Spent listed Hazardous K171 Catalyst

The ConocoPhillips Company owned and operated Bayway Refinery is committed to operating the refinery in an environmentally responsible manner. A source reduction program has been implemented and is continuously being improved.

The Bayway Refinery utilizes crude petroleum as a feed stock to produce a complete line of fuel products as well as petrochemical feed stocks and specialty products. As part of the operations of the refinery, a sulfur guard bed at the Hydrogen Process Unit was placed into service to remove trace amounts of sulfur contaminants from natural gas feedstock. The sulfur contaminants are removed by contacting the product with a Zinc oxide catalyst (ZnO).

Over time, the sulfur removal efficiency of the ZnO oxide catalyst decreases. The reactor is taken off-line and isolated. The spent catalyst is cooled to ambient temperatures and placed into 55-gallon capacity drums. Representative samples are taken and submitted to a State certified third-party contract laboratory for the analysis of waste classification parameters.

The Bayway Refinery has carefully evaluated a number of other catalysts to effect the removal of trace level sulfur contaminants from natural gas feedstock. The ZnO replacement catalyst was chosen because it is more reactive with sulfur and is capable of higher sulfur loading. Since ZnO catalyst requires less frequent catalyst change-outs, lesser volumes of spent catalyst will be generated. Strict adherence to detailed catalyst deactivation and change-out procedures reduces toxicity.

The Bayway Refinery has considered several waste management method alternatives for the spent ZnO catalyst. Off-site thermal treatment is not cost-effective and provides minimal environmental benefit since the sum of all organic constituents in the spent ZnO catalyst comprises less than 0.05 percent of the total spent catalyst volume. Furthermore, treatment of the spent ZnO catalyst by incineration does not reduce the arsenic hazard and would result in impermissible dilution of the arsenic component in the incinerator ash.

The Bayway Refinery has contacted several domestic metal reclamation facilities. Most of the plants determined that spent ZnO catalyst is not compatible with their metal reclamation process. Facilities that could have processed the catalyst lacked RCRA hazardous waste permits. The Bayway Refinery believes that Stablex, with its considerable expertise in the chemical treatment and fixation of inorganic waste constituents, is currently the best available option for the environmentally sound disposition of deactivated spent ZnO catalyst.

This minimization statement pertains to shipments of Catalyst Desiccant on page 4 of the annual report.

Waste Minimization Statement for Lead Contaminated Abrasives and Paint Chips

The ConocoPhillips Company owned and operated Bayway Refinery is committed to operating the refinery in an environmentally responsible manner. A source reduction program has been implemented and is continuously being improved.

The Bayway Refinery utilizes crude petroleum as feed stock to produce a complete line of fuel products as well as petrochemical feed stocks and specialty products. The facility does not purchase or produce lead containing products. The Bayway Refinery uses only environmentally friendly, non-lead based coatings on new and repaired equipment.

As part of the operations of the refinery, rust, scale and paint are removed from transfer lines, storage tanks and process equipment by sand blasting with abrasives in order to prepare surfaces for metal inspection, welding or repainting. Employees have been informed of the potential for lead based coatings at the refinery. They are trained to test dry paints and primers prior to removal and to segregate contaminated media from each job site regardless of generated volume.

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The horizontal speed, vertical speed, shot flow rate, and fixture movement are adjusted by remote control. The abrasive media are contained, circulated, and cleaned within the blast module. A cyclone separator on the ground separates the steel split shot from the media for re-use and deposits the paint and dust into plastic lined 55-gallon drums. The process reduces the volume of generated lead contaminated hazardous abrasives by up to 95%.

The Bayway Refinery has considered several waste management method alternatives. On-site remediation or fixation of the lead constituent contained in the waste is not feasible because of cost and the lack of treatment permits. Treatment of the low BTU waste by incineration does not reduce the lead hazard and would result in impermissible dilution of the lead component in the incinerator ash.

This minimization statement pertains to shipments of Lead Contaminated Paint Chips on page 5 of the annual report